1 MICHELE BECKWITH **Acting United States Attorney** 2 JOSEPH D. BARTON Assistant U.S. Attorney 3 2500 Tulare Street, Suite 4401 Fresno, CA 93721 4 Telephone: (559) 497-4000 Facsimile: (559) 497-4099 5 Attorneys for Plaintiff 6 United States of America 7 8 IN THE UNITED STATES DISTRICT COURT 9 EASTERN DISTRICT OF CALIFORNIA 10 11 UNITED STATES OF AMERICA, 1:25-CR-00017-JLT-SKO 12 Plaintiff, APPLICATION AND ORDER FOR 13 MONEY JUDGMENT v. 14 ANDREW ADLER. 15 Defendant. 16 17 On or about February 24, 2025, defendant Andrew Adler entered a guilty plea to conspiracy to 18 commit wire fraud in violation of 18 U.S.C. § 1349, as charged in the Information. 19 As part of his plea agreement with the United States, defendant Andrew Adler agreed to forfeit 20 voluntarily and immediately \$1,000,000, as a personal money judgment pursuant to Fed. R. Crim. P. 21 32.2(b)(1), which reflects a reasonable compromise between the parties for forfeiture purposes 22 concerning the proceeds the defendant obtained as a result of a violation of 18 U.S.C. § 1349 to which 23 he has pled guilty. See Defendant Adler's Plea Agreement ¶ II.F. Plaintiff hereby applies for entry of a 24 money judgment as follows: 25 1. Pursuant to 18 U.S.C. § 981(a)(1)(C), 28 U.S.C. § 2461(c), and Fed. R. Crim. P. 26 32.2(b)(1), the Court shall impose a personal forfeiture money judgment against defendant Andrew

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Adler in the amount of \$1,000,000.

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- 2. The above-referenced personal forfeiture money judgment is imposed based on defendant Andrew Adler's conviction for violating 18 U.S.C. § 1349. Said amount reflects a reasonable compromise between the parties for forfeiture purposes concerning the proceeds the defendant obtained, which the defendant agreed is subject to forfeiture based on the offense of conviction. Any funds applied towards such judgment shall be forfeited to the United States of America and disposed of as provided for by law.
- 3. Payment of the personal forfeiture money judgment should be made in the form of a cashier's check made payable to the U.S. Marshals Service, and sent to the U.S. Attorney's Office, Attn: Asset Forfeiture Unit, 2500 Tulare Street, Suite 4401, Fresno, CA 93721. Prior to the imposition of sentence, any funds delivered to the United States to satisfy the personal money judgment shall be seized and held by the U.S. Marshals Service, in its secure custody and control.

Dated: May 29, 2025 MICHELE BECKWITH Acting United States Attorney

/s/ Joseph D. Barton JOSEPH D. BARTON Assistant U.S. Attorney

ORDER

For good cause shown, the Court hereby imposes a personal forfeiture money judgment against defendant Andrew Adler in the amount of \$1,000,000. Payment of the personal forfeiture money judgment should be made in the form of a cashier's check made payable to the U.S. Marshals Service, and sent to the U.S. Attorney's Office, Attn: Asset Forfeiture Unit, 2500 Tulare Street, Suite 4401, Fresno, CA 93721.

Any funds applied towards such judgment shall be forfeited to the United States of America and disposed of as provided for by law. Prior to the imposition of sentence, any funds delivered to the United States to satisfy the personal money judgment shall be seized and held by the U.S. Marshals Service, in its secure custody and control.

IT IS SO ORDERED.

Dated: **June 2, 2025**

UNITED STATES DISTRICT JUDGE